

REMARKS/ARGUMENTS

These remarks are made in response to the final Office Action of July 9, 2008 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due. However, the Examiner is expressly authorized to charge any deficiencies to Deposit Account No. 50-0951.

Claim Rejections – 35 USC §§ 102 & 103

Claim 10 was rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Published Patent Application 2002/0032564 to Ehsani, *et al.* (hereinafter Ehsani). Claims 1-4, 6-9, 11-14, and 16-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ehsani in view of U.S. Patent 5,704,060 to Del Monte (hereinafter Del Monte).

Although Applicants respectfully disagree with the rejections, Applicants have cancelled Claims 1-20 and added new Claims 21-23. However, Applicants are not conceding that the claims as originally formulated or the cancelled claims fail to present patentable subject matter. The cancellations are solely for the purpose of expediting prosecution. Accordingly, the cancellations should not be interpreted as the surrender of any subject matter, and Applicants expressly reserve the right to present the original version of any of the cancelled claims in any future divisional or continuation applications from the present application.

As discussed herein, the newly added claims are fully supported throughout the Specification. No new matter has been introduced by the claim amendments.

Aspects of Applicants' Invention

It may be helpful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One embodiment of the invention, as typified by newly-presented Claim 21, is a method for creating speech recognition application callflow.

The method can include placing a prompt into a workspace of a graphical user interface for creating the speech recognition application callflow; assigning an individual option and a pre-built grammar to the same prompt; treating the individual option as a valid output of the pre-built grammar if the individual option is a potential valid match to a recognition phrase or an annotation in the pre-built grammar; and if the individual option fails to be a potential valid match to the recognition phrase or the annotation in the pre-built grammar, treating the individual option as an grammar independent from the pre-built grammar. See, e.g., Specification, paragraphs [0006], [0016] and [0017]; see also Fig. 1.

The Claims Define Over The Prior Art

Ehsani concerns modeling generic aspects of interactive discourse based on statistical modeling of phrases in large amounts of conversational text data. It involves automatically extracting valid phrases from a given text corpus, and clustering these phrases into syntactically and/or semantically meaningful equivalent classes. Various existing statistical and computational techniques are combined in a new way to accomplish this end. The result is a large thesaurus of fixed word combinations or phrases, grouped in equivalence classes that contain similar phrases. This thesaurus provides a data structure in which variations of saying the same thing and their associated probabilities can be looked up quickly. To the extent that this phrase thesaurus groups similar or semantically equivalent phrases into classes along with probabilities of their occurrence, it contains an implicit probabilistic model of generic structures found in interactive discourse, and thus can be used to model interactions across a large variety of different contexts, domains, and languages. See paragraph [0022].

Clearly, Ehsani concerns a method for creating a recognition grammar for use with an interactive user interface in which a phrase thesaurus is used to construct one or more equivalent expressions of one or more formulated expressions and the recognition

grammar comprises the collection of all of the expressions. In contrast, the present invention concerns a method for creating a speech recognition application callflow in which if the user combines pre-built grammars and any new options, the system searches the pre-built grammars for any matches to the new options, searching both valid utterances and associated annotations. If the new option exists in the pre-build grammar, the "new" option simply points to the equivalent grammar entry. Otherwise, the new option becomes part of a grammar automatically built to hold it, with the entry in the new grammar having the text of the new option as both the recognition string and an associated annotation. See Specification, paragraph [0016]. Ehsani applies to the technology of Natural Language Understanding (NLU) using Statistical Language Models. In contrast, the present invention applies to the technology of Finite State Grammars, which is very different from that of NLU. Therefore, the subject matter Ehsani is totally different from the subject matter of the present invention. There is nothing in Ehsani that teaches the fundamental aspect of the present invention, namely determining if user-added finite state grammar options conflict with a built-in grammar that is active at the same dialog step.

Other cited references do not make up for the deficiencies of Ehsani.

Accordingly, the cited references, alone or in combination, fail to disclose or suggest each and every element of newly added independent Claim 21. Applicants therefore respectfully submit that Claim 21 defines over the prior art. Furthermore, as each of the remaining claims depends from Claim 21 while reciting additional features, Applicants further respectfully submit that the remaining claims likewise define over the prior art.

Applicants thus respectfully request that the claim rejections under 35 U.S.C. §§ 102 & 103 be withdrawn.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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